

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

United States of America

Vs.

CR 11-186 01 S

Joseph Caramadre
And Raymour Radhakrishnan

**DEFENDANT JOSEPH CARAMADRE'S MOTION TO EXTEND TIME TO
FILE MOTION TO EXCLUDE RULE 15 DEPOSITIONS**

Now comes Defendant Joseph Caramadre who hereby moves this Honorable Court for an extension of time to file a motion to exclude Rule 15 Depositions for an additional 30 days, that is, from March 1, 2012 to March 30, 2012. The reason for this motion is that defense counsel requires additional time to complete research and drafting of the motion. Counsel for Co-Defendant Raymour Radhakrishnan agrees with the filing of this motion.

The period of time of any such continuance is excludable time under the Speedy Trial Act.

JOSEPH CARAMADRE
By his attorneys,

/s/ James T. McCormick
James T. McCormick (#2614)
McKENNA & McCORMICK
128 Dorrance Street, Suite 330
Providence, RI 02903-2814
(401) 831-2970
(401) 751-1797 (FAX)

CERTIFICATION

I hereby certify that on March 1, 2012, a copy of the foregoing Defendant Joseph Caramadre's Motion to Extend Time to File Motion to Exclude Rule 15 Depositions was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ James T. McCormick